

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Selena Boston, Jalisa Rhodes, )  
Lutisha Martinez, and Lanette Washington, )

Plaintiffs,

V.

Micah Sierra 'Katt' Williams, Tatiana  
Smith and John Doe 1-15,

Defendant.

**CIVIL FILE ACTION NO.**

1:23-CV-0752

## DECLARATION OF LOLETHA DENISE HALE

I, **LOLETHA DENISE HALE**, hereby declare under penalty of perjury under the laws of the State of Georgia that the following statement is true and correct and states as follows:

1.

I am over the age of majority and am laboring under no legal disabilities.

2.

I give this Declaration based upon my personal knowledge and facts contained herein for use in the above-styled matter.

3.

I am the attorney of record for the named plaintiffs in the above-styled civil matter.

4.

I have been licensed to practice in the State of Georgia for twenty-three (“23”) years. Prior to becoming an attorney, I worked as a certified paralegal for over ten (“10”) years.

5.

While working as a certified paralegal and while attending law school, my strengths were research and writing and civil procedure.

6.

In preparing plaintiffs’ response to Defendant’s Motion for Summary Judgment in this case, I made three (3) draft versions. Two of which had the same identical name; one in all caps. I apparently uploaded and electronically filed the incorrect version with this Court.

7.

I learned of this error upon receipt of Defendant’s Reply, and was absolutely mortified to learn I had done so.

8.

During the time of preparing and filing plaintiffs' response, I was dealing with a number of life distractions and challenges.

9.

I had been dealing with constant and pronounced pain which made it difficult to walk and required me to use walking aide(s) at time. It was apparent I was experiencing these during the depositions held in this case.

10.

I underwent a medical procedure to offer relief from the pain and inflammation in June, and not until recently (in the last week or so) have been able to walk without some assistance.

11.

I have also been dealing with a former law office suite-mate, friend and sole practitioner who I have known for approximately twenty years whose cancer has returned and has spread to his brain requiring surgery. He had one of two tumors removed and resulted in loss of sight in one eye. He is still undergoing cancer treatment and therapy, and clearly unable to practice law. I, along with others, are actively promoting a fundraiser to assist him with his life expenses.

12.

In addition, I felt compelled to travel to Temple, TX where my best friend from law school, Cheryl Braziel (who I have known for 25-plus years) was transitioning. I arrived on July 16, 2025 and spent several days with her, and she transitioned on Tuesday, July 22, 2025.

13.

I had completed plaintiffs' response to Defendant's Motion for Summary Judgement prior to going to Texas, and electronically filed plaintiffs' response brief on August 5, 2025, which was the day of Cheryl's funeral.

14.

I inform this Court and opposing counsel of these challenges not to evoke sympathy but to explain my conduct and the mistake I made in uploading and electronically filing the wrong brief.

15.

I take full responsibility for my actions and apologize to this Court, opposing counsel, and most importantly, my clients.

16.

I will accept whatever reasonable and just punishment this Court imposes upon me because I am the responsible party.

Executed this 18<sup>th</sup> day of August 2025.

**DECLARANT:**

  
Loletha Denise Hale, Esq.